

Ralph and Sandra Stone, Debtors

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FILED
NEWARK, NJ
2020 MAY 27 AM 9:03

JEANNE A. NAUGHTON

BY: 
DEPUTY CLERK

UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF NEW JERSEY

In re:

Honorable John K. Sherwood, U.S.B.J.

Ralph Dean Stone and

Chapter 13

Sandra Marie Stone,

Case No. 17-12835 (JKS)

Debtors

Hearing Date: May 28, 2020

Hearing Time 10:00 am

DEBTORS' CERTIFICATION IN RESPONSE

TO ATTORNEY'S FEE APPLICATION

Ralph Stone and Sandra Stone certify as follows:

We are the debtors in this matter. We are making this certification to dispute items on the Attorney's Fee Application.

First. On February 21, 2018 we were charged \$750.00 plus costs to draft and file Motion to Redeem Boat. The agreement between all parties for the boat redemption was a one time payment by us of \$25,000.00 in full and final satisfaction of the AmeriCu boat loan. This understanding was conveyed to Mr. Stone (Attorney) and we feel that when he prepared the Motion to Redeem he should have also included in that Motion that the Proof of Claim of AmeriCu be stricken to finalize this deal and in order to avoid any additional costs on our behalf. On February 4, 2020 he had to file another Motion to have AmeriCu's Proof of Claim stricken thereby costing us another \$768.80, which we are asking to be removed from the attorney's bill.

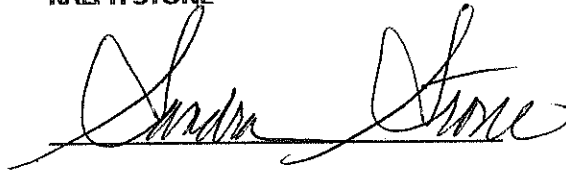
Second. Regarding the charge on May 2, 2020 there was never a discussion between Mr. Stone (Attorney) and us in regards to the adding of our income tax return preparation fee to this bankruptcy. As a matter of fact it was never discussed at all with us and it was a complete surprise to see it added to our bankruptcy. Obviously there was never a meeting of the minds. We ask the Court to remove the \$600.00 fee, \$280.00 preparation fee, and \$14.55 costs for a total of \$894.55. Mr. Stone (Attorney) makes reference to us not being able to pay for the preparation of the tax return. This is not the case. We were feeling him out to see if he was open to passing that fee forward to a less fortunate businessman in these hard times. If he was open to it we were going to match his donation of \$600.00 and give one of our tenants a free pass on one month's rent. We have included to Mr. Stone (Attorney) check number 9753 in the amount of \$600.00 for the preparation of our tax return.

We certify that the foregoing statements made by us are true. We are aware that if any of the foregoing statements made by us are willfully false, we are subject to punishment.

Dated: May 13, 2020

A handwritten signature in black ink, appearing to read 'Ralph Stone', written over a horizontal line.

RALPH STONE

A handwritten signature in black ink, appearing to read 'Sandra Stone', written over a horizontal line.

SANDRA STONE